UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)		
)	
v.)	Criminal No. 04-10288-RWZ
)	
CARLOS ESPINOLA, ET AL.)	

GOVERNMENT'S MOTION TO UNSEAL COMPLAINT AND AFFIDAVIT

The United States of America hereby moves this Court to direct that the complaint and accompanying affidavit (docket numbers 1 and 2) be unsealed. On June 29, 2004, upon the request of the United States, the Court sealed the above-specified documents. The thirteen defendants in this case have been taken into government custody and there is no longer a need for secrecy with regard to the complaint and affidavit.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By: David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

Date: April 4, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants.

/s/ David G. Tobin
David G. Tobin
Assistant United States Attorney

Date: April 4, 2006